

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

JANE DOES I, II, III and FRIENDS
OF FARMWORKERS, INC. D/B/A
JUSTICE AT WORK IN ITS
CAPACITY AS EMPLOYEE
REPRESENTATIVE,

Plaintiffs,

Case No.: 3:20-cv-01260

EUGENE SCALIA, IN HIS OFFICIAL
CAPACITY AS UNITED STATES
SECRETARY OF LABOR;
OCCUPATIONAL SAFETY AND
HEALTH ADMINISTRATION,
UNITED STATES notice
DEPARTMENT OF LABOR,

Defendants.

JOINT STATUS REPORT

Pursuant to this Court's order of June 23, 2020, Dkt #6, the parties submit this Joint Status Report regarding their efforts to reach an amicable resolution of the matters raised in Plaintiffs' Complaint and Petition for Writ of Mandamus, Dkt. #1.

The Parties discussed possible amicable resolutions of this case by videoconference and email. Plaintiffs made a proposal for absolving the need for a hearing tomorrow in exchange for certain conditions. Defendants did not accept Plaintiffs' proposal.

Respectfully submitted this 30th day of July 2020.

/s/ David H. Seligman

David H. Seligman, CO Bar No. 49394

Juno Turner, NY Bar No. 4491890*

Brianne Power, CO Bar No. 53730

TOWARDS JUSTICE

1410 High St., Suite 300

Denver, CO 80218

Telephone.: 720-239-2606

david@towardsjustice.org

juno@towardsjustice.org

brianne@towardsjustice.org

David Muraskin, D.C. Bar No. 1012451

Karla Gilbride, D.C. Bar No. 1005586

PUBLIC JUSTICE, P.C.

1620 L Street NW, Suite 630

Washington, DC 20036

Telephone: (202) 797-8600

Fax: (202) 232-7203

kgilbride@publicjustice.net

dmuraskin@publicjustice.net

Adrienne H. Spiegel, CA Bar No. 330482*

475 14th Street, Suite 610

Oakland, CA 94612

Telephone: (510) 622-8207

aspiegel@publicjustice.net

*Attorneys for Friends of Farmworkers, Inc.,
d/b/a Justice at Work*

FRIENDS OF FARMWORKERS, INC.,

D/B/A JUSTICE AT WORK

Lerae Kroon, PA Bar No. 325464

Nina Menniti, PA Bar No. 326828

Samuel Datlof, PA Bar No. 324716

990 Spring Garden St, Suite 300

Philadelphia, PA 19123

Telephone: (215) 733-0878
Fax: (215) 733-0878
lkroon@justiceatworklegalaid.org
nmenniti@justiceatworklegalaid.org
sdatlof@justiceatworklegalaid.org
Attorneys for Jane Does I, II, and III

NICHOLS KASTER, PLLP
Matthew H. Morgan, MN Bar No. 304657
Anna P. Prakash, MN Bar No. 0351362*
4600 IDS Center
80 S. Eighth Street
Minneapolis, Minnesota 55402
Telephone: (612) 256-3200
Fax: (612) 338-4878
morgan@nka.com
aprakash@nka.com

*Attorneys for Friends of Farmworkers, Inc.,
d/b/a Justice at Work*
* application for admission *pro hac vice*
forthcoming

DAVID J. FREED
UNITED STATES ATTORNEY

/s/ G. Michael Thiel,
G. MICHAEL THIEL
Assistant U.S. Attorney
Atty. I.D. #PA 72926
235 N. Washington Ave., Ste. 311
Scranton, PA 18503
Phone: (570) 348-2800
mike.thiel@usdoj.gov

KATE S. O'SCANNLAIN
SOLICITOR OF LABOR
U.S. DEPARTMENT OF LABOR

/s/ Oscar L. Hampton III

OSCAR L. HAMPTON III

Regional Solicitor

Atty. I.D. #MO 36778

170 S. Independence Mall West

Suite 630

East Philadelphia, PA 19106

(215) 861-5120

hampton.oscar@dol.gov

EDMUND C. BAIRD

Associate Solicitor for Occupational
Safety and Health

RICHARD T. BUCHANAN

Deputy Regional Solicitor

MICHAEL P. DOYLE

Regional OSHA Counsel

CERTIFICATE OF SERVICE

I hereby certify that I caused this brief to be filed in ECF, which caused a copy to be served on counsel for all parties.

/s/ David H. Seligman

David H. Seligman, CO Bar No. 49394

TOWARDS JUSTICE

1410 High St., Suite 300

Denver, CO 80218

Telephone.: 720-239-2606

david@towardsjustice.org